

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AEGEAN MARINE PETROLEUM
NETWORK, INC. SECURITIES
LITIGATION

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) Case No. 1:18-cv-04993 (NRB)
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) Hon. Naomi Reice Buchwald
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**NOTICE OF LEAD PLAINTIFF’S MOTION FOR AN ORDER: (I) PRELIMINARILY
APPROVING PROPOSED PARTIAL CLASS ACTION SETTLEMENT;
(II) PRELIMINARILY CERTIFYING THE SETTLEMENT CLASS; AND
(III) APPROVING NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that Lead Plaintiff Utah Retirement Systems (“Lead Plaintiff”), on behalf of itself and the proposed Settlement Class (as defined in the accompanying Memorandum of Law and the Stipulation and Agreement of Partial Settlement dated November 9, 2021 (the “Stipulation” or “Partial Settlement”), submitted concurrently herewith), hereby moves this Court before the Honorable Naomi Reice Buchwald, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: (a) preliminarily approving the Partial Settlement set forth in the Stipulation; (b) preliminarily certifying the Settlement Class; (c) providing for Notice (the “Preliminary Approval Order”), which is attached as Exhibit A to the Stipulation; (d) appointing Lead Plaintiff as Class Representative and Lead Counsel as Class Counsel for purposes of the Partial Settlement only; (e) scheduling a Final Approval Hearing; and (f) granting such other and further relief as the Court deems just and proper.

The proposed Partial Settlement was reached by Lead Plaintiff and PricewaterhouseCoopers Auditing Company S.A. (“PwC Greece”). This proposed Partial Settlement does not resolve the claims against defendants Dimitris Melissanidis, Spyros Gianniotis and Deloitte Certified Public Accountants, S.A (the “Non-Settling Defendants”).

PwC Greece supports the relief requested and will not oppose this motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff submits herewith: (1) Memorandum of Law In Support of Lead Plaintiff's Motion For An Order: (I) Preliminarily Approving Proposed Partial Class Action Settlement; (II) Preliminarily Certifying The Settlement Class; and (III) Approving Notice To The Settlement Class; and (2) the Declaration of Nicole Lavallee in support thereof, attaching the Stipulation and Agreement of Partial Settlement (which itself attaches a proposed order).

Dated: November 9, 2021

Respectfully submitted,

BERMAN TABACCO

By: /s/ Nicole Lavallee
Nicole Lavallee (admitted *pro hac vice*)

Joseph J. Tabacco, Jr. (JT1994)
Christopher T. Heffelfinger (admitted *pro hac vice*)
Kristin Moody (admitted *pro hac vice*)
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